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1940-2002
JOHN J. TIGUE, JR.
1939-2009

*ALSO ADMITTED IN WASHINGTON, D.C.

**ALSO ADMITTED IN CONNECTICUT

VIA ECF

Hon. Analisa Torres United States District Judge United States District Court Southern District of New York New York, New York 10007

Re: <u>United States v. Glenn Blicht</u>,

19 Cr. 591 (AT)

Dear Judge Torres:

We represent Glenn Blicht in the above-captioned matter and write, with the consent of the Government, to seek a modification to the conditions of his pretrial release.

Mr. Blicht was arrested on July 26, 2019 and presented before Magistrate Judge Stewart D. Aaron. Judge Aaron set the following terms for Mr. Blicht's release: (a) a \$100,000 personal recognizance bond; (b) signed by two financially responsible people; (c) travel limited to the Southern and Eastern Districts of New York, as well as the District of New Jersey and the District of Connecticut; (d) the surrender of travel documents; (e) the imposition of pretrial supervision; and (f) an order that Mr. Blicht have no contact with "any victims or witnesses including individuals referenced in the complaint or similarly situated."

After Mr. Blicht pled guilty before your Honor on October 16, 2019, this final bail provision was amended to allow Mr. Blicht to contact the Local 1964 chapter of the International Longshoremen's Association and its employees regarding issues related to his employment separation and on matters not relating to the business affairs of the union, as well as to allow Mr. Blicht to contact Mr. Allan Parker and Mr. Larry Cole on matters not relating to the business affairs of the union.

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P. C.

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Mr. Blicht was sentenced to 24 months' imprisonment on February 12, 2020. In light of this, we respectfully request that the Court modify the terms of Mr. Blicht's release as follows: "The defendant's no contact condition of bail is lifted, except that the defendant will have no contact with the Government's cooperating witness."

As we indicated above, this application is made with the consent of the Government. Thank you very much for your consideration of this matter.

Respectfully submitted,

/s Telemachus P. Kasulis

Telemachus P. Kasulis

GRANTED. It is ORDERED that Defendant's conditions of release are modified as stated above.

SO ORDERED.

Dated: February 18, 2020 New York, New York

ANALISA TORRES United States District Judge